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*Attorneys for Plaintiff, Deutsche Bank National Trust Company, Formerly Known as Bankers Trust Company of California, N.A., as Trustee for American Home Mortgage Investment Trust 2005-2*

10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 DEUTSCHE BANK NATIONAL TRUST  
13 COMPANY, FORMERLY KNOWN AS  
14 BANKERS TRUST COMPANY OF  
15 CALIFORNIA, N.A., AS TRUSTEE FOR  
16 AMERICAN HOME MORTGAGE  
17 INVESTMENT TRUST 2005-2,

18 Plaintiff,

19 vs.

20 FIDELITY NATIONAL TITLE GROUP,  
21 INC.; COMMONWEALTH LAND TITLE  
22 INSURANCE COMPANY; DOE  
23 INDIVIDUALS I through X; and ROE  
24 CORPORATIONS XI through XX, inclusive,

25 Defendants.

Case No.: 2:20-cv-01885-APG-VCF

**STIPULATION AND ORDER TO  
EXTEND TIME PERIOD TO RESPOND  
TO MOTIONS TO DISMISS [ECF Nos. 4  
& 5]**

**[First Request]**

26 COMES NOW Plaintiff Deutsche Bank National Trust Company, Formerly Known as  
27 Bankers Trust Company of California, N.A., as Trustee for American Home Mortgage  
28 Investment Trust 2005-2 (“Deutsche Bank”), Defendant Commonwealth Land Title Insurance  
Company (“Commonwealth”) and Fidelity National Title Group, Inc. (“FNTG”) (collectively,  
the “Parties”), by and through their respective attorneys of record, hereby stipulate and agree as  
follows:

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1. On September 23, 2020, Deutsche Bank filed its Complaint in Eighth Judicial District Court, Case No. A-20-821781-C [ECF No. 1-2];
2. On October 8, 2020, Commonwealth filed a Petition for Removal to this Court [ECF No. 1];
3. On October 13, 2020, Commonwealth filed a Motion to Dismiss [ECF No. 4];
4. On October 13, 2020, FNTG also filed a Motion to Dismiss [ECF No. 5]
5. Deutsche Bank's deadline to respond to Commonwealth and FNTG's Motions to Dismiss is currently October 27, 2020;
6. Deutsche Bank's counsel is requesting a thirty-four (34) day extension until Monday, November 30, 2020, to file its response to Commonwealth and FNTG's Motions to Dismiss;
7. This extension is requested to allow counsel for Deutsche Bank additional time to review and respond to the points and authorities cited to in the pending Motions;
8. Counsel for Commonwealth and FNTG does not oppose the requested extension;

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9. This is the first request for an extension which is made in good faith and not for purposes of delay.

**IT IS SO STIPULATED.**

DATED this 27<sup>th</sup> day of October, 2020.

WRIGHT, FINLAY & ZAK, LLP

/s/ Lindsay D. Robbins

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*Attorneys for Plaintiff, Deutsche Bank*

*National Trust Company, Formerly Known as*

*Bankers Trust Company of California, N.A.,*

*as Trustee for American Home Mortgage*

*Investment Trust 2005-2*

DATED this 27<sup>th</sup> day of October, 2020.

SINCLAIR BRAUN LLP

/s/ Kevin Sinclair

Kevin Sinclair, Esq.

Nevada Bar No. 12277

16501 Venture Boulevard, Suite 400

Encino, California 91436

*Attorneys for Defendants, Fidelity National*

*Title Group, Inc. and Commonwealth Land*

*Title Insurance Company*

**IT IS SO ORDERED.**

Dated this 27th day of October, 2020.

  
UNITED STATES DISTRICT COURT JUDGE